



Used Oil Cleanup Checklist

Hazardous Waste Program technical bulletin

7/2003

1. Respond in writing to the Missouri Department of Natural Resources' Notice of Violation with description of corrective actions you will take and a schedule of activity for cleanup. See below for the potential actions that will help you write a response.
2. Excavate all visibly contaminated soil and debris (the waste).
3. Determine if free liquids are present in the waste by using Method 9095 from *Publication SW-846* of the U.S. Environmental Protection Agency (EPA). Note: If a minimal amount of free liquids are present, a non-hazardous absorbent may be added to the excavated waste.
4. Any recovered liquid oil should be containerized and managed in compliance with the applicable requirements for used oil in Chapter 11 of the *Missouri Hazardous Waste Management Regulations* and the referenced 40 CFR Part 279 regulations. Also the *Management Standards for Used Oil Generators* technical bulletin (PUB131).
5. Place all non-liquid waste in covered containers, on tarps or heavy-gauge plastic and cover well to minimize human contact and further loss to the environment.
6. Estimate the total quantity of waste to be disposed.
 - A. If the waste is less than five cubic yards and does not contain any free liquid or any other hazardous waste
 1. Send the waste to a permitted sanitary landfill after completing and submitting the *Special Waste Disposal Request* form (MO 780 –1166) as directed on the form.
 2. No further action or submittals are required.
 - B. If the waste is more than five cubic yards
 1. Determine if the waste contains free liquid. Note: If the waste contains free liquid, you must have a laboratory conduct a flashpoint analysis. If the waste does not contain free liquid, a flashpoint analysis is not necessary. See #3 above for the test method.
 2. Collect and have laboratory analyses conducted on representative samples of the waste according to sample collection, preservation, handling and analysis procedures for the Toxicity Characteristic Leaching Procedure (TCLP) found in Appendix II of 40 CFR Part 261. The purpose of the sampling is to determine if the waste exceeds the regulatory maximum concentrations of the following eight toxic "heavy" metals:



Arsenic	5.0 mg/l
Barium	100.0 mg/l
Cadmium	1.0 mg/l
Chromium	5.0 mg/l

Lead	5.0 mg/l
Mercury	0.2 mg/l
Selenium	1.0 mg/l
Silver	5.0 mg/l

3. Also collect and have laboratory analyses conducted on representative samples of the waste according to a Total Volatile Organics Analysis (Total VOA). The sampling should be conducted according to the sampling collection, preservation, handling and analysis procedures for Total VOA found in EPA test method 8240 or 8260 in SW-846. The purpose of this sampling is to determine if the waste was mixed with solvents, which would cause the waste to be hazardous.
 4. If any one of the regulatory limits identified in B. #2 is exceeded, or the waste has a flashpoint of less than 60 degrees Celsius (140 degrees Fahrenheit), the waste is hazardous and you must do the following:
 - A. Register as a hazardous waste generator using the *Notification of Regulated Waste Activity* form (PUB 2065/MO 780 - 1164).
 - B. Send all laboratory analyses reports and any documentation concerning the waste to the Missouri Department of Natural Resources, Hazardous Waste Enforcement Unit, P.O. Box 176, Jefferson City, MO 65102-0176, and wait for further instructions from the Unit prior to disposal. Include a cover note stating that you have found this used oil-contaminated material to be hazardous and you are awaiting instruction from the department.
 - C. Note: If the waste is hazardous, you will be required to use a licensed hazardous waste transporter and manifest system for shipment of the waste to a permitted or interim status hazardous waste disposal facility.
 5. If laboratory analyses show that no regulatory limit is exceeded, the waste does not contain solvents, other hazardous waste, free liquids and is not ignitable, you may dispose of it at a permitted sanitary landfill after you
 - A. Complete and submit the *Special Waste Disposal Request* form as directed on the form, and
 - B. Submit a copy of your fully signed *Special Waste Disposal Request* to the Hazardous Waste Program's Hazardous Waste Enforcement Unit, which includes the landfill representative's signature.
- Note:** If you generate in one month, or accumulate at any one time, one hundred kilograms (approximately 220 pounds or 1/2 of a 55-gallon barrel) or more of hazardous waste, you must register as a hazardous waste generator with the Department of Natural Resources. See the *Notification of Regulated Waste Activity* (PUB 2065/MO 780 – 1164). This form must also be updated any time the reported information changes.

For more information

Missouri Department of Natural Resources
Hazardous Waste Program
P.O. Box 176
Jefferson City, MO 65102-0176
1-800-361-4827 or (573) 751-3176
Fax (573) 751-7869
www.dnr.mo.gov/alpd/hwp

If you are using a Telecommunications Device for the Deaf (TDD), please call Relay Missouri at 1-800-735-2966.